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and BROOKDALE SENIOR LIVING  
COMMUNITIES, INC.

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

STACIA STINER, et al.,  
Plaintiffs  
v.  
BROOKDALE SENIOR LIVING, INC.;  
BROOKDALE SENIOR LIVING  
COMMUNITIES, INC.; and DOES 1 through  
100,  
Defendants.

Case No. 4:17-cv-03962-HSG

**STIPULATION AND ORDER RE  
FILING OF FOURTH AMENDED  
COMPLAINT**

**STIPULATION**

WHEREAS, on August 24, 2023, the Court conducted a case management conference in this case at which, among other things, the Court directed the parties to meet and confer regarding the filing of a Fourth Amended Complaint; and

WHEREAS, the parties have met and conferred and reached agreement as to the form of the proposed Amended Complaint; and

WHEREAS, attached hereto as Exhibit A is a true and correct copy of the proposed Fourth Amended Complaint to which the parties have agreed, including Exhibit A; and

WHEREAS, attached hereto for the Court's convenience as Exhibit B is a true and correct copy a redline version of the proposed Fourth Amended Complaint showing the edits and additions made to the Third Amended Complaint;

NOW, THEREFORE, IT IS HEREBY STIPULATED, subject to this Court's approval, that Plaintiffs may file their Fourth Amended Complaint, in the form attached hereto as Exhibit A, immediately upon the issuance of the Court's Order on this Stipulation.

IT IS SO STIPULATED.

DATED: October 12, 2023

SCHNEIDER WALLACE  
COTTRELL KONECKY LLP

By: /s/ Guy B. Wallace  
Guy B. Wallace

Attorneys for Plaintiffs and the Proposed Classes

DATED: October 12, 2023

MOORE & LEE, LLP

By: /s/ Erica Rutner  
Erica Rutner

Attorneys for Defendants

**ORDER**

The Court, having considered the above Stipulation of Plaintiffs and Defendants and good cause appearing therefor, **IT IS HEREBY ORDERED** that Plaintiffs may file their Fourth Amended Complaint in this action, in the form identified as Exhibit A to the parties' Stipulation, within 5 days of this Order.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 10/13/2023



Honorable Haywood S. Gilliam, Jr.  
United States District Judge